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April 29, 2022

## VIA CM/ECF

Honorable Debra C. Freeman Daniel Patrick Moynihan United States Courthouse 500 Pearl Street New York, New York 10007

RE: Brian Joseph Gref v. American International Industries, et al. Case No.: 1:20-cv-05589-GBD-DCF

Dear Judge Freeman:

The parties have conferred and are in agreement that the following discovery deadlines be amended as follow:

- 1. Defendants' expert reports from Robert C. Adams and Mickey E. Gunter are to be provided by May 6, 2022; and
- 2. Defendants' expert reports from Tim D. Oury; Allan Feingold; Brooke T. Mossman, and Kenneth A. Mundt are to be provided by May 13, 2022.

If this joint request meets with Your Honor's approval, the parties respectfully request that the Court so-order the Scheduling Order amended as set forth above.

As always, we are available at the Court's convenience if you have any questions or would like additional information.

Respectfully Submitted,

Alfred J. Sargente

AJS/tl

cc: All Counsel of Record via CM/ECF co-defendants (via e-mail)